## IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In re A.W., a minor, by and through his

natural guardian, K.W.,

In re J.H., a minor, by and through his

natural guardian, V.H.,

In re Q.W., a minor, by and through his

natural guardian, B.R.,

In re M.A., a minor, by and through her

natural guardian, A.A.,

In re D.F., a minor, by and through her

natural guardian, D.J.F., and

In re T.R., by and through his natural

guardian, D.M.,

Plaintiffs,

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WOODLAND HILLS SCHOOL
DISTRICT, CHURCHILL BOROUGH,
DYNASTY SECURITY, KEVIN
MURRAY, STEPHEN SHAULIS, ALAN
JOHNSON, CHRIS LEWANDOWSKI,
PATRICK SCOTT, JOSEPH GOLDEN
and JOHN DOE.

Defendants.

No. 2:17-CV-01112-DSC

JURY TRIAL DEMANDED

## PETITION PURSUANT TO LOCAL RULE 17.1 FOR LEAVE TO SETTLE MINOR'S CLAIM

AND NOW comes the Petitioner, D.J.F., guardian and natural parent of his minor child, D.F. by and through his attorney, Timothy P. O'Brien, Esquire, and petitions this Court for leave to settle the minor's claims arising from an incident, the facts and alleged details of which are more fully set forth in the Plaintiff's Second Amended Complaint.

- 1. The minor plaintiffs' date of birth is September 6, 2002.
- 2. The minor plaintiff's allegations are as follows: While she was a student at Woodland Hills High School she was, on two separate occasions, assaulted by security

personal including a security guard employed by Defendant Dynasty Security and Defendant Shaulis, a School Resource Officer employed by Defendant Churchill Borough. She was also falsely charged with criminal offenses resulting in her expulsion from Woodland Hills High School and her incarceration in Shuman Juvenile Detention Center. This caused the minor Plaintiff significant physical and emotional injuries. Defendants contest these allegations.

- 3. In accordance with ongoing settlement negotiations, of which this Court was notified, the parties have agreed to a settlement of Plaintiff's claims for the sum of \$150,000.00. No attorney's fees and/or costs will be deducted from the settlement amount, as any and all costs and attorney's fees will be paid from a separate fund agreed to by the above-captioned parties.
- 4. It is the opinion of the undersigned counsel for the plaintiff, and the considered opinion of D.J.F., that the foregoing settlement is fair reasonable.
- 5. The monies recovered on behalf of the minor plaintiff as set forth above will be distributed and made payable to D.J.F, Guardian on behalf D.F., a minor, to be deposited into an interest-bearing account with withdrawals only upon court approval until the minor reaches age of majority, (proof of deposit to be filed with this court within 30 days of receipt of the settlement funds).

WHEREFORE, the petitioner, D.J.F. requests this Honorable Court to enter an order approving the settlement of the minor's claim in this matter and directing the distribution of the proceeds of this settlement as set forth in Paragraph 5 of this petition.

Respectfully submitted,

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Attorney for petitioner